



PLP

MODERN SLAVERY POLICY

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INTRODUCTION

Peel Logistics Management Limited and its subsidiary companies (“**PLP**” or the “**Company**”) are committed to combating modern slavery and human trafficking in accordance with the Modern Slavery Act 2015 (the “**MSA**”). PLP strictly prohibits the use of modern slavery and human trafficking in our business operations and supply chain and will use all routes available to it to terminate any business relationship with any person should any instance or case of slavery or human trafficking become known to it.

PLP takes modern slavery and human trafficking in its business operations and supply chain with the utmost seriousness, and is committed to acting ethically, honestly, and responsibly, and doing all it can to manage the risk of it occurring in our business operations and supply chain. PLP recognise that the human rights of our stakeholders are essential to build, developing and protecting a conducive and fair society. As a responsible business, PLP strives to promote robust business ethics, and will continue to work collaboratively with our stakeholders to develop our response to, and protection against, modern slavery and human trafficking. It aims to achieve this through the implementation of the terms of this Modern Slavery Policy (the “**Policy**”).

All employees, (whether part time or full time), officers, contractors and consultants (together the “**Employees**”), must adhere to the terms and conditions set out by the Policy at all times and in all places, to ensure that PLP can do all it can to combat the risk of modern slavery and human trafficking in its business operations and supply chain.

THIRD PARTIES

PLP often engages the services of third-party entities, such as infrastructure and construction contractors, planning and technical consultants, leasing and sale agents and valuers/appraisers, amongst others, either on PLP’s own account or on behalf of the ventures PLP provides services to (the “**Third Party**” or “**Third Parties**”).

These Third Parties are expected to have their own modern slavery and human trafficking avoidance policies and procedures to ensure they can comply with the requirements of the MSA and do all they can to combat modern slavery and human trafficking in their own business operations and supply chain. To the extent possible, Third Parties conducting business with, or on behalf of PLP, or the ventures PLP provides services to, are expected to read and comply with this Policy.

RESPONSIBILITY AND AUTHORITY

PLP’s board of directors (the “**Board**”) are ultimately responsible for the content and implementation of the Policy and any associated policies, and they actively encourage and empower the Employees to ensure the terms and sentiment of the Policy are actively and effectively implemented. PLP’s Operations Director has the day-to-day responsibility for overseeing the implementation and roll out of the content of the Statement and the Policies.

WHAT IS MODERN SLAVERY AND HUMAN TRAFFICKING?

Modern slavery is the severe exploitation of other people for personal or commercial gain and involves the control of vulnerable people who can face violence or threats, be forced into inescapable debt, and/or have had their freedom taken away. In short, it is exploitative labour that places one person in the control of another.

Slavery exists on a spectrum of exploitation and sometimes it is hard to establish a clear line to define what constitutes slavery, however, if a person is forced to carry out work for which they didn't offer themselves voluntarily, and they are not free to leave, it is a case of slavery.

Someone is in slavery if they are:

- forced to work – through mental or physical threat;
- owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse;
- dehumanised, treated as a commodity or bought and sold as 'property';
- physically constrained or have restrictions placed on his or her freedom of movement.

Modern slavery takes many forms, the most common are:

- Human trafficking – the use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced labour, criminality or marriage, amongst other types of exploitation;
- Forced labour – any work or services people are forced to do against their will under threat of punishment to themselves, or those close to them;
- Debt bondage/bonded labour – this is acknowledged to be the most common form of slavery in the modern world. People trapped in poverty are forced to borrow money, and subsequently forced to work to pay off the debt, losing control over both their employment conditions and the debt;
- Descent-based slavery – widely regarded as the most traditional form of slavery, where people are treated as property, and their "slave" status has been passed down their maternal line; and
- Slavery of children – when a child is exploited for someone else's gain. This can include child trafficking and child domestic slavery.

Human trafficking is the process of trapping people through the use of violence, deception or coercion and exploiting them for financial or personal gain. As such, modern slavery and human trafficking go hand in hand and it is generally acknowledged that one does not occur without the other.

In practice, and taking into consideration PLP's business model, human trafficking means people tricked or forced into accepting risky job offers and trapped into forced labour in building sites or factories, or recruited into service industry to be trapped, exploited and abused behind closed doors, with no way out.



Victims of trafficking do not have to be transported across borders for trafficking to take place, in fact transporting or moving the victim does not define trafficking. It can take place in a single country, or even within a single community.

FORCED LABOUR

Forced labour is the most likely type of slavery PLP will encounter through its business operations. It is any work or service which people are forced to do against their will, under threat of punishment. Almost all slavery practices contain some element of forced labour.

It is often found in the construction and manufacturing industries and often affects the most vulnerable and excluded groups of people.

Migrant workers are particularly exposed as they do not speak the local language so struggle to raise their concerns or report their situation, have few friends so are isolated and vulnerable and have limited rights and depend on their employers to survive.

Forced labour tends to happen in the context of poverty, lack of sustainable jobs and education, as well as a weak rule of law, corruption and an economy dependent on cheap labour.

IDENTIFYING SIGNS OF SLAVERY

Some of the signs a person is in slavery Employees should look out for are:

- they appear to be under the control of someone else and reluctant to interact with others through fear of retribution;
- have no personal identification on them;
- have few personal belongings, wear the same clothes every day or wear unsuitable clothes for work;
- not be able to move around freely;
- be reluctant to talk to strangers or authorities;
- appear frightened, withdrawn or show signs of physical or psychological abuse;
- dropped off and collected for work always in the same way and at unusual times.

SUPPLY CHAIN

Slavery exists in all stages of the supply chain, from the sourcing of raw materials to the manufacturing of goods and at the later stages of shipping and construction or delivery of the final product.

Most products pass through a long chain of producers, manufacturers, distributors and contractors before they might reveal themselves to PLP and its Employees.



Taking the risks prevalent to PLP and its supply chain, the highest risk area of its business operations is the supply of building materials to site which are used to complete our real estate development projects (the “Projects”).

PLP adopts an outsourced model, where it engages with Third Parties to ensure timely, efficient delivery of the Projects. As such, it relies on the policies, procedures and controls the Third Parties have in place to manage slavery and human trafficking in its supply chain.

PLP has implemented a Procurement Policy which sets out the steps PLP takes when entering into new business relationships with Third Parties. Employees are required to read, understand and follow the steps set out in the Procurement Policy when recommending PLP, or the ventures it provides services to, enters into new business relationships.

Existing business relationships are subject to ongoing due diligence as set out later in the [Modern Slavery Audits](#) section below.

CONTROLS AND COMPLIANCE

PLP recognises that a strong moral sense in everything we do is essential to the success of our business, and we have to act with morality, a strong ethical code, and in accordance with the law. To effectively manage the risk of modern slavery and human trafficking in our business operations and supply chain, PLP has implemented several policies for our Employees and Third Parties are expected to read, understand and follow which are listed below.

THE POLICIES

- CODE OF ETHICS

The backbone of PLP’s policy and procedure framework is its Code of Ethics. It is a continuous condition of employment at PLP. It sets out the ethical standards expected of all Employees in their daily role and accomplishment of their responsibilities. Third Parties are required to adopt their own Code of Ethics, or similar such document, the terms of which align to PLP’s Code of Ethics. Any breaches of the Code of Ethics by Employees will result in disciplinary action which may result in dismissal for misconduct or gross misconduct.

- PROCUREMENT POLICY

PLP has established a Procurement Policy which sets out the process, terms and conditions for PLP, or the ventures PLP provides services to, to enter into a business relationship with a Third Party. The Procurement Policy requires Third Parties to be competent and legally compliant with the regulatory and legal framework for the particular job, task or action they are being engaged for.



Third Parties are expected to have robust measures in place to ensure they can effectively manage the risk of modern slavery and human trafficking in their own business operations and supply chain and PLP require a positive confirmation that such measures exist at any Third Parties prior to formal engagement.

Any Third Party PLP enters into a business relationship with is required to adhere to this Policy. This includes the need for employees of Third Parties to be protected from forced and child labour, as well as our own expectations regarding fair remuneration and accurate documentation through written terms of employment.

PLP reserves the right to terminate any business relationship with a Third Party if they do not comply with the terms of this Policy.

REPORTING FRAMEWORK AND WHISTLEBLOWING

Our Employees are encouraged to raise any concerns they may have regarding modern slavery and human trafficking in accordance with PLP's Whistleblowing Policy which is available through PLP's intranet.

All of PLP's modern slavery and human trafficking policies and procedures are supported by the statements set out in the Code of Ethics, and provide a clear statement that any person with concerns about modern slavery and human trafficking, either within PLP, the Third Parties, or any other person or legal entity that an Employee becomes aware of, whether or not PLP has and maintains a business relationship with, may report their concerns to the Operations Director, to the Board or to PLP's independent whistleblowing service on a confidential basis.

TRAINING AND AWARENESS

PLP's Employees are all required to read, understand and sign an attestation confirming they have read and understood the Code of Ethics, which references this Statement and the associated Policies, which clearly sets out the framework PLP has put in place to ensure all Employees are aware of modern slavery and human trafficking, and give them the tools and knowledge they need to eradicate this from occurring in our business operations and supply chain.

PLP also ensures Employees are provided with an e-learning module on modern slavery to ensure Employees can understand what modern slavery is and how to identify and report the signs of modern slavery occurring.

MODERN SLAVERY AUDITS

PLP carries out periodic risk assessments and due diligence on our own business operations and our supply chains to help combat modern slavery and human trafficking. This involves periodic audits of the Third Parties that provide services to PLP, or to the ventures PLP provides services to, to ensure they have appropriate anti-slavery and human trafficking controls in place.



The Operations Director at PLP is responsible for working with and reviewing the Third Parties policies, procedures and controls regarding anti-slavery and human trafficking, to ensure they are fit for purpose and can achieve compliance with the scope and requirements of this Policy.

On a risk-based approach, this review may include:

- performing a risk assessment to identify parts of our supply chain and that of the Third Parties;
- ensuring appropriate checks are performed on Employees, their right to work and contractual provisions and remuneration surrounding their employment at PLP;
- ensuring our Third Parties have conducted appropriate checks on their own employees, suppliers, consultants and sub-contractors to ensure that all employees receive the statutory rights they are entitled to under UK law;
- ensuring appropriate training has been provided to the Employees, and the employees, consultants, contractors or sub-contractors of the Third Parties;

REPORTING AND ESCALATION

If an Employee suspects that someone is in slavery, they should not, under any circumstances, confront them or cause a scene as this will likely lead to increased harm and retribution to them. Instead, Employees are encouraged to inform the relevant authorities or organisations working in the field of anti-slavery and human trafficking. Here are several such authorities or organisations:

- The Modern Slavery Helpline – 08000 121 700
- Gangmasters and Labour Abuse Authority – 0800 432 0804 or email intelligence@gla.gov.uk
- Crimestoppers – 0800 555 111
- Police – 111 or 999 (depending on the circumstances)

If, for any reason, an Employee feels uncomfortable or unsure of reporting to the authorities, they are encouraged to escalate their concerns to the CEO or the Operations Director at PLP.

BREACHES OF THIS POLICY

Any Employee who breaches this Policy will face disciplinary actions, which could result in dismissal for misconduct or gross misconduct.

PLP reserves the right to terminate our business relationship with any Third Party who breach the terms of this Policy.



EXECUTION

Signed for and on behalf of Peel Logistics Management and its subsidiary companies

Name:
Position:
Date:

VERSION CONTROL

Version Control	
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